

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DAVID FREEMAN,
Plaintiff,

v.

CITY OF NEWTON and NEWTON
POLICE DEPARTMENT,
Defendants.

C.A. No. 1:25-cv-11187-MJJ

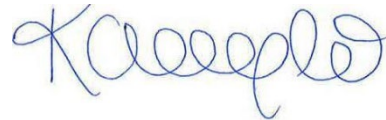
EMERGENCY MOTION TO STAY DOCKET FILINGS

The Defendants City of Newton and the Newton Police Department (“NPD”) (together, “the Municipal Defendants”) hereby move this honorable Court to enter an order staying motion practice until the resolution of the Municipal Defendants’ pending *Motion to Dismiss* [Dkt. No. 13]. The Municipal Defendants filed this motion on May 13, 2025, and Plaintiff David Freeman (“Freeman”) docketed an opposition on May 16, 2025.

The Municipal Defendants specifically request that this Court stay all current motion practice, including the deadlines to respond to any currently docketed notices and motions, until the Court has ruled on the *Motion to Dismiss*, and issue an order preventing parties from docketing further notices or motions without leave of Court during this same time period. The Municipal Defendants submit this motion on an emergency basis, as there are multiple currently pending motions on the docket with a response deadline of next Friday, June 20, 2025, and the Defendants respectfully request that this motion apply to stay the deadlines to respond to those motions. The Municipal Defendants have submitted a memorandum of law in support of this motion.

Accordingly, and for the reasons articulated in the Municipal Defendants' Memorandum of Law, the Municipal Defendants hereby request that this Court issue the above-requested stay.

Respectfully submitted,
THE DEFENDANTS,
CITY OF NEWTON and NEWTON
POLICE DEPARTMENT,
By their counsel,

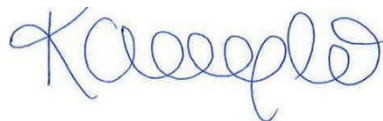


Kristen N. Annunziato (BBO #706923)
kannunziato@newtonma.gov
Assistant City Solicitor
City of Newton Law Department
1000 Commonwealth Avenue
Newton Centre, MA 02459
Tel: 617-796-1240

Date: June 12, 2025

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and further electronic copies and/or paper copies will be sent to those indicated as nonregistered participants on June 12, 2025:



Kristen N. Annunziato, Esq. (BBO #706923)